



Wincorn Fishman LLP

29-28 41st Avenue, 1st Floor, Long Island City, NY 11101, (646) 688-3234, www.wincornfishman.com

VIA CM/ECF

August 3, 2020

Hon. J. Paul Oetken
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Van Elzen v. Global Strategy Group, LLC and American Directions Research Group, Inc.*, No. 1:20-cv-03541

Dear Judge Oetken:

On behalf of Plaintiff David Van Elzen, I write to you to request an extension of time to respond to Defendant Global Strategy Group, LLC’s (“Global”) Motion to Stay (Dkt. 10) and Defendant American Directions Research Group, Inc.’s (“American”) Motion to Dismiss or Stay (Dkt. 11), up to and including August 26, 2020.

The Defendants’ motions were filed on July 22, 2020, which makes Plaintiff’s current responsive deadline August 5, 2020. Counsel for Defendants have agreed to the requested extension in order to give Plaintiff sufficient time to consider and adequately respond to Defendants’ simultaneously-filed motions. Accordingly, Plaintiff respectfully requests an extension of time from August 5, 2020 to August 26, 2020 to respond to the motions filed by Global and American. This is Plaintiff’s first request for an extension of time to respond to such motions.

Respectfully submitted,

/s/ Benjamin Fishman

Benjamin Fishman